UNITED STATES COURT OF APPEALS FOR THE FOURTH CIRCUIT

JOANN HAYSBERT)	
Plaintiff-Appellant,)	
V.)	Appeal No.: 25-1332
v.)	
OUTBACK STEAKHOUSE)	
OF FLORIDA, LLC)	
)	
Defendant-Appellee.)	
)	
)	

MOTION FOR EXTENSION OF TIME TO FILE BRIEF OF APPELLEE

COMES NOW, Defendant-Appellee, Outback Steakhouse of Florida, LLC, by counsel, and in and for its Motion for Extension of Time to File Brief of Appellee, states the following:

- 1. Plaintiff-Appellant filed her opening brief on August 5, 2025. Defendant-Appellee's deadline to file its brief is September 4, 2025. Doc. 36.
- 2. The Federal Rules of Appellate Procedure permit that a deadline may be extended for "good cause." Fed. R. App. P. 26(b).
- 3. Good cause exists to grant this extension. This extension is sought to permit counsel for Defendant-Appellee to provide the Court with a comprehensive brief on the nuanced issues raised in Plaintiff-Appellee's brief, and to accommodate

counsel leading the drafting efforts in light of unexpected issues arising in other litigation matters.

- 4. Further, this is Appellee's first request for an extension of an appellate deadline in this matter, and none of the parties will suffer prejudice by extending this deadline.
- 5. Counsel for Plaintiff-Appellant consents to the granting of this Motion, including the specific extension of time requested.

WHEREFORE, Defendant-Appellee, Outback Steakhouse of Florida, LLC, Virginia, respectfully requests that the Court extend the deadline for Appellee's brief to September 15, 2025.

OUTBACK STEAKHOUSE OF FLORIDA, LLC By Counsel

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CERTIFICATE OF SERVICE

I hereby certify that on 2nd day of September 2025, a true and accurate copy of the foregoing was sent via the CM/ECF system and served upon:

Judah J. Ariel, Esq. Ariel Law 751 Fairmont Street, NW #3 Washington, D.C. 20001 judah@ariel-law.com Counsel for Appellant

> <u>/s/ William W. Miller</u> William W. Miller